

207189

American Airlines®

MAINTENANCE AND ENGINEERING CENTER

DEPT. OF TRANSPORTATION
DOCKETS

December 9, 2002 DEC 10 AM 9:52

FAA-2002-14041-1

U.S. Department of Transportation
Docket Management System
400 7th Street, SW
Room PL 401
Washington, DC 20591-0001

Subject: Petition for Exemption – FAR 121.313
American Airlines Model A300-B4-605R Aircraft

Ladies/Gentlemen:

Pursuant to 14 CFR §11.25, American Airlines, petitions the Administrator for an exemption until July 9, 2003, from certain requirements of 14CFR, Chapter 1, Part 121.313 Paragraph j (1) and the requirements set forth in Docket Number FAA-2001-11032, Amendment 121-288 (Flight Deck Door Standards).

14CFR, Chapter 1, Part 121.313 Paragraph j (1) states, "After April 9, 2003, for airplanes required by paragraph (f) of this section to have a door between the passenger and pilot or crew rest compartments, and for transport category, all-cargo airplanes that have a door installed between the pilot compartment and any other occupied compartment on January 15, 2002." Sub-paragraph j,1 states, "Each such door must meet the requirements of §§ 25.795 (a)(1) and (2) in effect on January 15, 2002." Regrettably, due to the repeated delay of all required service bulletins and parts for our A300 aircraft, American Airlines has been forced into a position where we have no choice but to file a petition for relief from the deadline of April 9, 2003. This petition for exemption seeks relief from the April 9, 2003 requirement until no later than July 9, 2003. This will allow American Airlines the additional time needed to perform the required Flight Deck Door Modifications on our A300-B4-605R fleet. To date, American Airlines maintenance timelines show that all our other in-service fleets are on schedule to meet the April 9, 2003 requirement. Manufacturer support for our other fleet types has proven to be sufficient to accommodate our maintenance needs and Engineering support and material deliveries are predicted to be adequate to meet the required date. Unfortunately, with Airbus, The manufacturer support has not been adequate for us to meet the required date for our A300 fleet.

American Airlines requests that to accommodate this exemption, an extension of SFAR 92 until July 9, 2003 be granted. SFAR 92 allows temporary variances from existing design standards for the doors and establishes a period during which non-compliance with design requirements will be allowed while improvements to flight crew compartment security are made.

Under the provisions of SFAR 92, American has installed a Flight Deck Door Interlocking Device (Katy-Bar) on our in-service fleets. An extension of this SFAR would allow American to continue operating our A300 aircraft with the Katy Bars installed until the door modification can be accomplished.

Under the provisions of 14CFR, Chapter 1, Part 11.87 (c) American Airlines requests that this petition be pursued as an “Expedited Review” due to the fact that any delaying action in this process will have severe adverse affects on American Airlines and its operations. It is critical that American receive an answer quickly so as to accommodate the advance schedule requirements and ensure our A300 aircraft will be available to our customers. Should American be denied this petition, we will need to accommodate our advance schedule to put our aircraft out of service and cancel the numerous flights that have already been booked in advance.

It is also requested, under the provisions of 14 CFR, Chapter 1, Part 11.35 (a, b), that this petition be exempt from the public docket due to the security nature of the subject matter at hand and the proprietary nature of current American Airlines maintenance processes.

The reason for this petition is that all current data clearly indicates that American Airlines will not be able to meet the current “deadline” restrictions set forth in CFR 121.313 on our A300-B4-605R fleet.

American Airlines has received less than adequate support from the aircraft manufacturer. Airbus has consistently demonstrated their inability to deliver timely engineering support and required kits. Specifically, Airbus has failed to deliver critical Service Bulletins required to accomplish the required door installations. To date, only two (2) of the required four (4) service bulletins have been received from Airbus. Airbus has consistently slipped their original scheduled delivery dates and now has informed American Airlines that the remaining service bulletins will be delayed as late as January 20, 2003 with some parts to shipping in the first week of February. Due to this unforeseen delay in Manufacturer support, American Airlines will not be able to complete the installation of the new cockpit door on all of our A300 fleet by the required date of April 9, 2003.

American, as part of this petition, will plan to modify as many as three A300 aircraft simultaneously at our Tulsa maintenance base, as Airbus kit deliveries permit. Original data indicated that the complete modification would require 8 days to complete. After careful evaluation during the first A300 prototype, it was determined that installation would actually require 15 days. Based upon the Manufacturer’s projected delivery dates and American’s maintenance timeline, American currently plans to complete approximately 15 of the 34 aircraft by the April 9, 2003 requirement.

The requested exemption should be granted, while maintaining a level of safety equivalent to Phase 1 of the SFAR compliance (Installation of the Katy bars), because it is limited in applicability, scope, and duration such that it would not impair the overall level of safety.

The exemption would only apply to a limited number of Model A300-B4-605R airplanes, those of which parts are not available with time to install.

Accordingly, the requested exemption would be in the best interest of the public, as American will continue to operate the A300 fleet during the completion of this modification. Denial of this petition will have detrimental effects on American Airlines due to the fact that we will have to take additional A300 aircraft out of service thus incurring severe revenue loss. More importantly, denial of this petition will have a severe impact on the thousands of customers who have already booked passage on these future scheduled flights.

We request that a finding of good cause be made for granting the requested exemption. American has diligently requested that Airbus complete their Engineering and FAA certification, and provide kits since late 2001. In a public FAA meeting at Seattle Washington with the airlines and airplane manufacturers on September 19, 2002, American advised the FAA that we were unable to determine the modification requirements and the part/engineering delivery data from Airbus, and requested that FAA aide us in this determination. To date, Airbus has not fully defined the modification by providing all required FAA Approved Service Bulletins, nor has Airbus provided a complete set of kits to American. Without this information, American is unable to commence the modifications.

A summary of this petition as required by 14 CFR §11.25 is attached. If any further information is required, please contact Mark Boes, Director of Engineering, at (918) 292-3444.

Sincerely,



R. H. Phillips
Vice President
Engineering & QA

Attachment

cc: Dionne Krebs
Rulemaking Program Manager, ANM-100
Federal Aviation Administration
1601 Lind Avenue SW
Renton, Washington 98055

SUMMARY OF PETITION

Pursuant to 14 CFR §11.25, American Airlines, petitions the Administrator for an exemption until July 9, 2003, from certain requirements of 14CFR, Chapter 1, Part 121.313 Paragraph j (1) and the requirements set forth in Docket Number FAA-2001-11032 (Flight Deck Door Standards).

Airbus has consistently slipped and rescheduled delivery dates of required service bulletins and kits for the Flight Deck Door Modification. Original projected accomplishment time went from 8 days to 15 days, doubling the required time to accomplish the mod. These combined factors have left American Airlines with an insufficient time frame to complete the required door modifications on all of the A300-B4-605R fleet.

American requires an exemption that will allow an extension to the April 9, 2003 requirement in order to have adequate time to complete the required Door Modifications. American will complete the required Door Modifications no later than July 9, 2003.

The requested exemption should be granted that, while maintaining a level of safety equivalent to Phase 1 of the SFAR compliance (Installation of the Katy bars), The requested exemption is limited in applicability, scope, and duration. This exemption applies only to American's A300-B4-605R fleet.

This exemption would prevent the impact to customers who have already booked passage on future flights that would consequently be canceled if this request were denied. Additionally, this exemption would avoid the impact to American Airlines due to revenue loss as a result of the aforementioned canceled flights.